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4 Suite 450
5 San Francisco, CA 94104
6 (415) 391-3900

7 Laurie J. Bartilson
8 BOWLES & MOXON
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10 Suite 2000
11 Los Angeles, CA 90028
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RECEIVED
JAN 19 1994
HUB LAW OFFICES

13 Attorneys for Plaintiff
14 CHURCH OF SCIENTOLOGY INTERNATIONAL

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16 FOR THE COUNTY OF MARIN

17 CHURCH OF SCIENTOLOGY) CASE NO. BC 038955
18 INTERNATIONAL, a California not-)
19 for-profit religious corporation;) DECLARATION OF LAURIE J.
20 Plaintiff,) BARTILSON IN SUPPORT OF
21 vs.) REPLY TO DEFENDANTS'
22) OPPOSITIONS TO MOTIONS TO
23) COMPEL PRODUCTION OF
24) DOCUMENTS FROM DEFENDANTS
25 GERALD ARMSTRONG; MICHAEL WALTON;)
26 THE GERALD ARMSTRONG CORPORATION,)
27 a California for-profit)
28 corporation; Does 1 through 100,)
inclusive,)
Defendants.)

29 LAURIE J. BARTILSON deposes and says:

30 1. My name is Laurie J. Bartilson and I am one of the
31 attorneys responsible for the representations of the plaintiff in
32 this action. I have personal knowledge of the facts set forth in
33 this Declaration and could competently testify thereto if called
34 as a witness.

35 2. I have been informed by my co-counsel, Andy Wilson,

1 that he received some documents from Armstrong on the afternoon
2 of January 18, 1994. I received some documents from Armstrong in
3 my mail delivery today. These are the first documents to be
4 produced by any defendant in this action.

5 3. I have been a licensed attorney since November, 1979,
6 when I was admitted to practice before the Supreme Court of the
7 State of Massachusetts. I was admitted to practice by the
8 California State Bar in December, 1988, and have been a member in
9 good standing of that bar continuously since my admission. I
10 have never been subjected to any disciplinary proceedings by any
11 bar of any state.

12 4. My religion is irrelevant to these proceedings, and
13 certainly no business of Armstrong's. However, I can assure the
14 Court that, contrary to Armstrong's hearsay declaration, I am not
15 subject to any Scientology system of control and punishment; nor
16 am I under any compulsion to "obey [my] Seniors' orders" or be
17 handled by increasing levels of punishment. I find it outrageous
18 that I should even be forced to respond to these attempts at
19 character assassination merely because I represent the plaintiff
20 herein.

21 5. I am familiar with the policies of my client concerning
22 the Rehabilitation Project Force ("RPF"). Contrary to Mr.
23 Greene's unsupported rhetoric, the RPF is a spiritual program
24 intended and designed to help an individual who has transgressed
25 against his or her own moral code to recover his or her spiritual
26 and personal integrity. It is neither a "prison" nor
27 "punishment." Indeed, the program is entirely a voluntary
28 program. I am not, and have never been, eligible to participate

1 in the RPF program, nor do I intend to so participate. There is
2 no one who could "order" me to do so.

3 6. Attached hereto and incorporated herein are true and
4 correct copies of documents submitted as exhibits in support of
5 plaintiff's Reply:

6 Exhibit A: Letter to Judge Thomas from Ford Greene dated
7 December 13, 1993

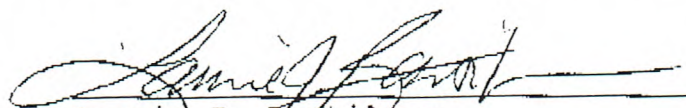
8 Exhibit B: Excerpts of Deposition of Gerald Armstrong,
9 Volume V, March 10, 1993

10 Exhibit C: Excerpts of Deposition of Gerald Armstrong,
11 Volume IV, October 8, 1992

12 Exhibit D: Excerpts of Deposition of Gerald Armstrong,
13 June 24, 1992

14 I declare under the penalty of perjury under the laws of the
15 State of California that the foregoing is true and correct.

16 Executed this 19th day of January, 1994, at Los Angeles,
17 California.

18 
19 Laurie J. Bartilson
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01-19-94 03:53PM FROM BOWLES & MOXON

TO 91415954093878899

POC5

FORD GREENE
LAWYER

HUB LAW OFFICES
711 SIR FRANCIS DRAKE BOULEVARD
SAN ANSELMO, CALIFORNIA 94960-1949
(415) 258-0360

LICENSE No. 107601
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December 13, 1993

The Honorable Gary W. Thomas
SUPERIOR COURT OF CALIFORNIA, COUNTY OF MARIN
Hall of Justice, Civic Center
San Rafael, California 94903

RE: *Scientology v. Armstrong*
Marin County Superior Court
Case No. 157 680

Dear Judge Thomas:

In response to Mr. Wilson's letter to you dated December 2, 1993, I join in his request that both discovery matters be heard on January 21, 1994. The reason for this is that I have a long-standing, pre-paid commitment that will take me to New Jersey from January 10-16, 1994. Thus, I am unavailable on January 14, 1994.

It is my hope and request that the Court will accommodate this request.

Sincerely,



FORD GREENE

:acg

cc: Andrew Wilson
Laurie Bartilson

01-19-94 03:53PM

FROM BOWLES & MOXON

TO 81416954093878899

P007

EXHIBIT B

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

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CHURCH OF SCIENTOLOGY)
INTERNATIONAL, a California)
not-for-profit religious)
corporation,)
)
Plaintiff,)
)
vs.)
)
GERALD ARMSTRONG; DOES)
1 through 25, inclusive,)
)
Defendants.)
_____)

CERTIFIED
COPY

Case No. BC 052395

DEPOSITION OF
GERALD ARMSTRONG
VOLUME V
PAGES 525 - 624

WEDNESDAY, MARCH 10, 1993

REPORTED BY: LYNN P. NYLUND, CSR NO. 3696

Mary Hillabrand, Inc.
520 Sutter Street
San Francisco, CA 94102

1 A. Yes.

2 Q. Was it the same person who evaluated the
3 works at \$900,000?

4 A. No.

5 Q. What year were the other works that you say
6 were evaluated at \$900,000 evaluated?

7 A. I think '89.

8 Q. Are these still works -- works still the
9 property of The Gerald Armstrong Corporation?

10 A. Most of them.

11 Q. What happened to the works that are not any
12 longer property of The Gerald Armstrong Corporation?

13 A. The corporation gave them to me. I --
14 that's other than the ones which were taken.

15 Q. So what is the value of the evaluated amount
16 attributed to the works that still remain the property of
17 The Gerald Armstrong Corporation?

18 A. I think they are close to 1.5 billion.

19 Q. And who's evaluated them at that amount?

20 A. I did.

21 Q. Did you have any independent appraiser
22 evaluate your amount?

23 A. No.

24 Q. So that's your estimate of their worth?

25 A. Right.

1 Q. Has anybody ever offered you any dollar
2 amount at all for any of the works?

3 A. Certain of them.

4 Q. Can you identify which of the works? Just
5 if you can identify them by a number if you like and tell
6 me what amounts you were offered for those particular
7 works?

8 A. I have been offered \$15 a page. And I have
9 been paid \$750, and I have been paid \$15 a page.

10 Q. And the \$15 a page was for literary works as
11 opposed to drawings?

12 A. Either.

13 Q. For either drawings or writings?

14 A. Right.

15 Q. Now, is that offer of \$15 a page for works
16 that still belong to The Gerald Armstrong Corporation or
17 for actual works you actually sold for \$15 a page and are
18 no longer yours?

19 A. Both.

20 Q. By the way, was the payment of \$15 a page
21 made to you personally or to The Gerald Armstrong
22 Corporation?

23 A. Both.

24 Q. And this is for work that you considered to
25 be literary, artistic in nature?

01-19-94 03:53PM

FROM BOWLES & MOXON

TO 91415954093878899

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*Source of Report: [unclear]
[unclear] [unclear] [unclear] [unclear]*

1 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 IN AND FOR THE COUNTY OF MARIN

3 --oOo--

**CERTIFIED
COPY**

4 CHURCH OF SCIENTOLOGY
5 INTERNATIONAL, a California
6 not-for-profit religious
7 corporation,

8 Plaintiff,

9 vs.

No. BC 052395

10 Gerald Armstrong; Does 1-25,
11 inclusive,

12 Defendants.
13
14
15

16 DEPOSITION OF

17 GERALD ARMSTRONG

18 Thursday, October 8, 1992

19 VOLUME IV
20
21
22
23
24

25 REPORTED BY: BARBARA H. STOCKFORD, CSR No. 4575

1 assets are located?

2 A. Right.

3 Q. How did the company acquire these assets,
4 Mr. Armstrong?

5 MR. GREENE: It's irrelevant. Objection.

6 MS. BARTILSON: It's not after looking at
7 the company of the alter ego of Mr. Armstrong. It's
8 obviously relevant, and that's an issue in this case.

9 THE WITNESS: It acquired a number of them
10 by my initial transfer of them to the corporation from my
11 personal business at that time. It subsequently either
12 purchased or created the remainder.

13 MS. BARTILSON: Q. When was it that you
14 transferred the assets personally from your personal
15 property to the corporation?

16 A. The beginning of 1988.

17 Q. Do you recall the approximate value of the
18 assets that you transferred at that time?

19 A. Beyond the answer of no, I would decline to
20 get into it. Assert the right of privacy on behalf of
21 myself and the corporation.

22 Q. Has anyone else given assets to the
23 corporation besides you?

24 A. Going back to your earlier definition of
25 personal property as assets, and sticking to that

01-19-94 03:53PM

FROM BOWLES & MOXON

TO 91415954093878899

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IN AND FOR THE SUPERIOR COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

--oOo--

CHURCH OF SCIENTOLOGY
INTERNATIONAL, a California
not-for-profit religious
corporation,

**CERTIFIED
COPY**

Plaintiff,

vs.

Case No. BC 052395

GERALD ARMSTRONG; DOES 1
through 25, inclusive,

Defendants.

DEPOSITION OF

GERALD ARMSTRONG

Wednesday, June 24, 1992

REPORTED BY: SUSAN M. SKIGEN, CSR #5829

1 to you was done to you through what you call front
2 groups; is that right?

3 A. If by that you mean that you are a front
4 group, then that's correct.

5 Q. Well --

6 A. If you and CSI, and CSC, and RTC, and ASI,
7 and David Miscavige, and Norman Starkey, and L. Ron
8 Hubbard are all front groups, then I would say, yes,
9 you're correct.

10 Q. So you think I'm a front group; right?

11 A. If it fits your definition, it was you who
12 created the sentence and used that phrase.

13 Q. Well, let me ask you this. Do you think
14 that anything that's come out of this office was done to
15 drive you insane?

16 A. Yes.

17 Q. And specifically what?

18 A. The complaint itself, the use of the
19 videotape incident.

20 Q. You mean, the Griffith Park, the so-called
21 Griffith Park video?

22 A. Right.

23 Q. What else?

24 A. Maybe some more will come to mind.

25 Q. Okay.